

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-CV-00103-JRG-RSP

**DECLARATION OF KATHERINE D. PRESCOTT IN SUPPORT
OF SAMSUNG’S MOTION TO COMPEL RESPONSES TO INTERROGATORIES
AND REQUESTS FOR ADMISSION**

I, Katherine D. Prescott, hereby declare:

1. I am a Principal with the law firm Fish & Richardson P.C., and counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. I have personal knowledge of the facts contained in the declaration and, if called upon to do so, I could and would testify competently to the matters herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of an excerpt from Headwater’s Response to Samsung’s Third Set of Interrogatories (No. 25), served September 9, 2024.

3. Attached hereto as Exhibit 2 is a true and correct copy of an excerpt from Headwater’s Response to Samsung’s Third Set of Requests for Admission (Nos. 6-27), served September 9, 2024.

4. Attached hereto as Exhibit 3 is a true and correct copy of an excerpt from Headwater's Response to Samsung's Fourth Set of Requests for Admission (Nos. 28-40), served September 9, 2024.

5. On September 10, 2024, Kristopher Davis, counsel for Headwater, and I discussed Headwater's objections and responses to Interrogatory No. 25 and Requests for Admission 6, 8, and 30-31. The parties did not resolve their disputes.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of September, 2024, in San Carlos, California.

/s/ Katherine D. Prescott
Katherine D. Prescott